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United States District Court  
DISTRICT OF SOUTH CAROLINA

CASE NO. 4:17-cv-1746-MBS

Russel Geisler, Bernard Bagley, Willie James Jackson, Alton Brooks and on behalf of others similarly situated.

V.

Motion To Appoint Counsel and allow Plaintiff [REDACTED] as Party To the action AND objection to consent of injunctive relief in testing and hearing of January 29 2019

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Brian Sterling, Director of South Carolina Department of corrections (SCDC) in his official capacity and John B. Moore, MD, Division Director of Health and Professional Fed. Supervision

Four Honor. Due to Brian Sterling's policies I am unable to be tested for Hepatitis, HIV, Aids or any foreign antigen or Bacteria that causes effects to the immune system, Dr. Moore is following the orders of Brian Sterling and has told me that I will not be tested for any disease and that my max out date is around the corner. If I need treatment that I could get it on the street and that it will not be afforded by SCDC and that if he could he would but SCDC does not allow him to even give vitamins. This was said approximately around October of 2018, I'm having chest pains, I'm spitting up constant mucus out of my chest and at times blood, I'm fatigued and my Bronchial Tubes are inflamed, I have a loss of appetite, vomiting, I have joint pain and I'm light headed, my body is not detoxifying the toxic chemicals out of my body normally and I'm surrounded around sickly people and I'm being denied outside recreational, I'm breathing in recycled air and the ventilation system is filled of dust and toxic materials. The cumulative effect has caused a strain on my immune system and Brian Sterling has enforced inhuman conditions on inmates by barricading the windows preventing sunlight to come into the cells causing the body to not receive sun light, the body's source of energy, without sun light a violation of the ancient sun light doctrine, the body is left to decay coupled with SCDC's inadequate food diet lacking vitamin C and deficient in vitamin E necessary components to immune system support, and their lack of adequate vitamins on canteen and their denial to allow inmates on canteen restrictions to not buy their sold vitamins that are not F.D.A approved along with SCDC's "undrinkable" water that's full of chlorine at high volumes and deficient by DHEC Rules and national standards, puts a strain on the liver to detoxify the chemicals, these acts are exposure to disease and promotion of increased inflammation to weakened organs.

(P01)



Hepatitis can be caused by many drugs and Toxic chemicals, but in most instances it is caused by a virus. viral types A, B, C are the most common. Hepatitis A occurs sporadically or in epidemics and is transmitted primarily through fecal contamination. Hepatitis B is transmitted through infected blood or blood products as well as through sexual contact (the virus is shed in saliva, semen, and vaginal secretion).

Hepatitis C formerly known as hepatitis non A, non B) has a primary route of transmission through blood transfusions (about ten percent of people who received blood transfusions developed hepatitis C) in the past before the blood supply was checked for presence of hepatitis C. However, only four percent of cases of hepatitis C are now result of transfusions. Most cases are due to intravenous drug use, but the source of other cases of hepatitis C infection is unclear. The mortality rate from hepatitis C (one to twelve percent) is much higher than for the other forms. Other viral causes of hepatitis include hepatitis viruses, D, E, and G, as well as herpes simplex, cytomegalovirus and Epstein-Barr virus.

#### Diagnostic considerations

Diagnosis is made by the appearance of the typical signs and symptoms along with blood test showing elevation in liver enzymes. Liver enzymes such as SGPT, GGT, SGOT and alkaline phosphatase leak out into the blood when liver cells are damaged and the presence of viral antigens (compounds recognized as being foreign to the body, resulting in the formation of antibodies against them) or the antibodies that bind antigens. The type of virus involved is determined by identifying the viral antigens or specific antibodies in the blood. In cases of chronic hepatitis B or C, it is necessary to perform continual blood evaluation to monitor progression or clearance of the infection. In addition to liver enzymes hepatitis C is monitored by the presence of the hepatitis C viral RNA by [P.C.R.]. The higher the level of HCV RNA the more aggressive the chronic infection. Hepatitis B findings and their meanings see Encyclopedia of Natural Medicine additional by Michael Murray, N.D. and Joseph Pizzorno, N.D.

Plaintiff submits that CDC inmates are not being tested for viral antigens that are foreign to the body as shown testing for hepatitis takes time. Plaintiff submits that his max out date states April of 2019 and that he moves to be tested by that time and request that the

court grants that he be tested immediately, Applicant submits that SCDC is deliberately indifferent in testing for Heratitis C or any other disease that cause problems to the immune system if your less then a year of maxout this policy as a whole is denial of a inmates right to adequate treatment, whether it be Heratitis A, B, C, a viral infection, Bronchitis, Pneumonia, cancer, Aids etc and thus counsel shall be appointed to brief those issues on behalf of ~~the~~ the Plaintiff or ~~other~~ and others situated. Plaintiff submits that his illegally detained due to ~~SCDC~~ failure to accredit him Jail time credit on both sentences of ~~max~~ Aiding escape from the custody of officers and ABT, of a total of 18 months and that his requested defendant Brian Sterling to accredit him those credits and release him, and defendant Brian Sterling refuses. Plaintiff submits that those actions coupled with Brian Sterling Policy to drive Plaintiff screaming and Blood Test disabler the Plaintiff and others similarly situated to be treated by adequate medical professionals in Society, Plaintiff submit that on those requirements he shall be granted counsel. ~~see~~ ECF 122 P 9 of 3 counsel for the defendants have conferred with Plaintiff's counsel and while they acknowledge Mr. Brooks may ultimately be a member of one of the purported classes named Plaintiffs are seeking to represent, as shown Plaintiff has a Justifiable claim and request counsel to be represented just as the other in this case. I swear under penalty and perjury that the

foregoing is true and correct this 23<sup>rd</sup> day of January 2019

ATTHY BROOKS

ATTHY BROOKS

MCJ

386 Redemption way

McConnick SC 29899



I hereby certify that Plaintiff has sent the US District court at  
PO Box \_\_\_\_\_ Florence SC \_\_\_\_\_ by placing a copy of the same in the  
US Postal Service Box at McCormick Correctional this 23rd day of January 2019

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Alford Brooks 32320

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Re: Case ~~00~~ 4:17-cv-1746-MBS

Russel Eustice Bernard Boylet, Willie James Jackson and Alton Brock  
vs. Brian Sterling SDC Director, John Brimlee et al

Dear Clerk:

Enclosed is Plaintiff's motion to appoint counsel. Please have these documents filed. Thank you.

Sincerely, Alton Brock  
Alton Brock  
MCJ  
336 Redemption Way  
McCormick SC 29579

Date: January 23rd 2019